

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :  
: **INDICTMENT**  
: 25 Cr. \_\_\_\_

- v. -  
ERALD ALIMEHMETI,  
Defendant.

: 25 CRIM 120

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**COUNT ONE**

**(Attempted Provision of Material Support and Resources to a Designated Foreign  
Terrorist Organization)**

The Grand Jury charges:

1. From at least in or about June 2019, up to and including in or about November 2024, in Albania, the Southern District of New York, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, ERALD ALIMEHMETI, the defendant, who was first brought to and arrested in the Southern District of New York, knowingly attempted to provide, and aided and abetted the provision of, “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel and services, to a foreign terrorist organization, to wit, the Islamic State of Iraq and al-Sham (“ISIS”), which at all relevant times has been designated by the U.S. Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act (“INA”), and is currently designated as such as of the date of this Indictment, knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339(B)(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism

(as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Sections 2339B, 3238, and 2.)

**COUNT TWO**

**(Distribution of Information Relating to Explosives, Destructive Devices, and Weapons of Mass Destruction)**

The Grand Jury further charges:

2. In or about 2019 and 2020, in Albania, the Southern District of New York, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, ERA LD ALIMEHMETI, the defendant, who was first brought to and arrested in the Southern District of New York, taught and demonstrated the making and use of an explosive, a destructive device, and a weapon of mass destruction, and distributed by any means information pertaining to, in whole or in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, and aided and abetted the same, with the intent that the teaching, demonstration, and information be used for, and in furtherance of, activities that constitute Federal crimes of violence, to wit, ALIMEHMETI distributed bomb-making and explosives instructions over the internet with the intent that the information be used for, and in furtherance of, the use of a weapon of mass destruction, in violation of Title 18, United States Code, Section 2332a.

(Title 18, United States Code, Sections 842(p), 3238, and 2.)

**FORFEITURE ALLEGATIONS**

3. As a result of committing the offense alleged in Count One of this Indictment, ERA LD ALIMEHMETI, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section

2461(c), any and all assets, foreign and domestic, of the defendant; any and all assets, foreign and domestic, affording the defendant a source of influence over any entity or organization engaged in planning or perpetrating said offense; any and all assets, foreign and domestic, acquired or maintained with the intent and for the purpose of supporting, planning, conducting or concealing said offense; any and all assets, foreign and domestic, derived from, involved in, or used or intended to be used to commit said offense, including but not limited to a sum of money in United States currency representing the total amount of the defendant's assets.

4. As a result of committing the offense alleged in Count Two of this Indictment, ERA LD ALIMEHMETI, the defendant, shall forfeit to the United States, (i) pursuant to Title 18, United States Code, Sections 981(a)(1)(G), and Title 28, United States Code, Section 2461(c), any and all assets, foreign and domestic, of the defendant; any and all assets, foreign and domestic, affording the defendant a source of influence over any entity or organization engaged in planning or perpetrating said offense; any and all assets, foreign and domestic, acquired or maintained with the intent and for the purpose of supporting, planning, conducting or concealing said offense; any and all assets, foreign and domestic, derived from, involved in, or used or intended to be used to commit said offense, including but not limited to a sum of money in United States currency representing the total amount of the defendant's assets; and (ii) pursuant to Title 18, United States Code, Sections 982(a)(2)(B), 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Assets Provision**

5. If any of the above-described forfeitable property, as a result of any act or omission of ERALD ALIMEHMETI, the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
MATTHEW PODOLSKY  
Acting United States Attorney